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*Attorneys for Lead Plaintiffs Robert Wolfson and Frank
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ROBERT CRAGO, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiff,

v.

CHARLES SCHWAB & CO., INC., and THE
CHARLES SCHWAB CORPORATION,

Defendants.

Case No. 3:16-cv-3938-RS

CLASS ACTION

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF CLASS
CERTIFICATION SCHEDULE**

AS MODIFIED

1 Pursuant to Local Rule 6-2, Lead Plaintiffs Robert Wolfson and Frank Pino, named plaintiff
2 Scott Posson (collectively “Plaintiffs”), and Defendants Charles Schwab & Co., Inc. and The
3 Charles Schwab Corporation (“Defendants” or “Schwab” and, together with Plaintiffs, the
4 “Parties”), by and through their respective counsel, for good cause, hereby stipulate as follows:

5 WHEREAS, on June 21, 2018, the Court entered a Case Management Scheduling Order
6 setting the case schedule through the class certification hearing (ECF No. 136);

7 WHEREAS, the Parties have engaged in class certification and merits discovery and are
8 continuing to meet and confer in good faith regarding outstanding issues;

9 WHEREAS, in connection with class certification discovery, Plaintiffs seek from third-party
10 UBS Securities, LLC (“UBS”) the production of additional data regarding trade orders that Schwab
11 routed to UBS during the Class Period;

12 WHEREAS, Plaintiffs have met and conferred with UBS on multiple occasions regarding
13 the scope of the order data production, a negotiation that Plaintiffs believe has presented several
14 complex and novel issues;

15 WHEREAS, Plaintiffs have been unable to reach an agreement with UBS regarding the
16 production of trade data and on March 5, 2019, Plaintiffs filed a Motion to Compel Production in
17 the United States District Court for the Southern District of New York (the “Motion to Compel”)
18 (attached hereto as Exhibit 1);

19 WHEREAS, the Motion to Compel is fully briefed but oral argument has not yet been
20 scheduled;

21 WHEREAS, Plaintiffs need an extension of the current class certification deadlines to
22 accommodate the pending Motion to Compel;

23 WHEREAS, at Plaintiffs’ request, Defendants have agreed, with the Court’s approval, to
24 modify the Case Management Scheduling Order to extend the deadlines through the class
25 certification hearing;

26 WHEREAS, this is the Parties second request for an extension of the deadlines in the Case
27 Management Scheduling Order;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO APPROVAL BY THIS COURT, as follows:

The deadlines through the class certification hearing shall be as follows:

Event	Deadline
Pre-class certification fact depositions	July 2, 2019
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	September 2, 2019
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	November 18, 2019
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	January 7, 2020
Expert depositions concerning class certification	January 23-February 6, 2020
Plaintiffs' class certification motion and <i>Daubert</i> challenges	February 24, 2020
Defendants' class certification opposition, <i>Daubert</i> challenges, and <i>Daubert</i> opposition	April 27, 2020
Plaintiffs' reply brief, opposition to <i>Daubert</i> challenges, and reply to <i>Daubert</i> challenges of Defendants' expert(s)	May 14, 2020
Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	June 2, 2020
Class Certification Hearing	TBD (as soon as practicable on a date convenient to the Court)
Date for Parties to Seek to Engage in Private Mediation	November 1, 2019

IT IS SO STIPULATED.

Dated: April 12, 2019

GLANCY PRONGAY & MURRAY LLP

By: /s/ Joshua L. Crowell
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Attorneys for Plaintiff Scott Posson

1 Dated: April 12, 2019

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Attorneys for Defendants

ATTESTATION

I, Joshua L. Crowell, am the ECF User whose identification and password are being used to file this Joint Stipulation And [Proposed] Order For Extension Of Class Certification Schedule. In compliance with Local Rule 5-1(i)(3), I hereby attest that Counsel for Defendants concur in this filing.

DATED: April 12, 2019

Joshua L. Crowell
Joshua L. Crowell

~~PROPOSED~~ ORDER

Based on the Parties' stipulation and the good cause described therein, the Court GRANTS this stipulation. The following schedule shall apply:

Event	Deadline
Pre-class certification fact depositions	July 2, 2019
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	September 2, 2019
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	November 18, 2019
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Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	June 2, 2020
Class Certification Hearing	TBD (as soon as practicable on a date convenient to the Court) June 25, 2020
Date for Parties to Seek to Engage in Private Mediation	November 1, 2019

IT IS SO ORDERED.

DATED: 4/19/2019



Hon. Richard Seeborg
U.S. District Court Judge